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1 JOHN R. ROBERTS
2 Bankruptcy Trustee
3 P.O. Box 1506
4 Placerville, CA 95667-1506
5 (530) 626-6441

6 UNITED STATES BANKRUPTCY COURT
7 FOR THE EASTERN DISTRICT OF CALIFORNIA

8 IN RE: CASE NO. **08-31913-B-7**

9 **BALWINDER SINGH DULKU** DC NO. **JRR-4**
10 **KULWINDER KAUR DULKU**

11 Debtor(s).
12 _____/

DATE: **MAY 18, 2010**
TIME: **9:32 A.M.**
COURTROOM: **32**

13 **TRUSTEE'S MOTION TO ABANDON PROPERTY OF THE ESTATE**
14 **[11 U.S.C. § 554]**

15 The Trustee of the estate of the above-named debtor(s) intends to abandon the
16 following property of the debtor(s) pursuant to 11 U.S.C. §554:

17 1. Description of Property:

18 a. **Vacant Lot commonly known as 460 Rockport Circle, Folsom,**
19 **CA APN 072-0830-028-0000**

20 2. Careful investigation reveals that said property is validly encumbered by
21 virtue of the following security interests:

22 a. Abstract of Judgment in favor of Tri Counties Bank in the face amount
23 of \$37,127.89, recorded October 3, 2007.

24 b. Deed of Trust in favor of Gulinder Gill in the face amount of
25 \$75,000.00, recorded April 3, 2008.

26 c. Delinquent real property taxes in the approximate amount of
27 \$2,400.00.
28

1 3. Investigation further reveals that the current fair market value is:

2 a. **\$110,000.00**

3 4. The Trustee attempted to sell the property and actually received an offer.
4 However, when the title company ran the Preliminary Title Report the Abstract of
5 Judgment in favor of Tri Counties Bank surfaced. This lien was not disclosed on the
6 debtors' bankruptcy petition and schedules.

7 5. The above-described property is a burdensome asset to this estate for the
8 reason(s) set forth below; and investigation reveals there is no likelihood said property can
9 be sold for an amount sufficient to realize any monies into the estate.

10 6. Trustee wishes to abandon same for the following reason(s):

11 a. Liens exceed the value of the property.

12 b. There is no equity for the bankruptcy estate.

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14
15 WHEREFORE, the Trustee prays he be authorized to abandon the above-
16 described property as a burdensome asset.

17
18 DATED: April 28, 2010

19 /s/ JOHN R. ROBERTS, TRUSTEE
20 PO Box 1506
21 Placerville, CA 95667
22 530-626-6441
23 court@bankruptcy-info.com
24 State Bar No. 77919
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